## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ROADGET BUSINESS PTE. LTD., a private limited company organized in the country of Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A TO THE COMPLAINT,

Defendants.

Case No.: 1:23-cv-17036

Judge Sara L. Ellis

## PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A REPLY TO DEFENDANTS' OPPOSITION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff Roadget Business Pte. Ltd. ("Roadget") hereby files this unopposed motion to extend the deadline by which Roadget must reply to Defendants' Opposition for Entry of a Preliminary Injunction by fourteen (14) days, up to and including March 14, 2024. As grounds for this Motion, Roadget states as follows:

- 1. Defendants' response opposing Plaintiff's Motion for Entry of a Preliminary Injunction contains ten (10) excess pages that include numerous arguments, some of which are also used in their Motion to Dismiss. Accordingly, Roadget needs time to analyze and properly respond to Defendants' opposition.
- 2. When Defendants' response was filed, Roadget's Lead Counsel was attending to a family emergency out of the country that delayed his return home and directly interfered with his ability to attend to this matter.

- 3. Federal Rule of Civil Procedure 6(b)(1)(A) permits a court to extend the time to perform any act for good cause. Such good cause exists here. Given the length of Defendants' Opposition, the number of arguments made, and Lead Counsel's unexpected family emergency, Roadget needs additional time to analyze and properly respond to Defendants' points in opposition and the case law upon which they rely.
- 4. The parties have conferred, and Defendants' counsel is not opposed to the time extension sought herein.
- 5. This Motion is Plaintiff's first request for an extension of time. It is not being filed for the purpose of delay, and no party will be prejudiced by the relief requested herein.

## **REQUESTED RELIEF**

WHEREFORE, Roadget respectfully requests that the Court grant this unopposed motion and extend the time by which Roadget must reply to Defendants' Opposition up to and including March 14, 2024.

February 26, 2024

Respectfully submitted,

/s/ Steven J. Horowitz

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